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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

MAR 10 1988

MEMORANDUM

SUBJECT: Transmittal of Inspection Report-RCRA

FROM: Robert B. Dona *RB Dona*
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Michael Sanderson
Chief, RCRA/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA I.D. No.</u>	<u>Activity No.</u>	<u>Areas of Non-Compliance</u>
Pries Enterprises Incorporated	IAD981716806	AWF39	1. Waste determination 2. Container dating 3. Container labeling 4. Storage area inspection 5. Storage over 90 days 6. Interim status storage regulations
Independence, Iowa			

Attachments

RECEIVED

MAR 14 1988

RCOM SECTION



R00050172
RCRA Records Center

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: Pries Enterprises Incorporated

Facility Location: Independence, Iowa

EPA ID Number: IAD 981716806

Date of Inspection: 2/11/88

Inspector: David N. Whiting

Activity Number: AWF39 Inspection Type: CEI - other

Date Report Transmitted: 3/9/88

*Date Report Received: / /

*Additional Information Requested/Needed Not Included In Report:

#Photographs Taken: 8 #Photographs in Report: 8

*Additional Copies Needed (Specify Which)

*Additional Information Needed By: / /

Field Notes Taped [Yes/No]

*Disposition: Retain, Discard, Transcribe.

#Samples Taken:

#Samples Analyzed:

*Disposition: Retain, Discard, Analyze more (specify which)

*Report Reviewed By:

*Date Review Completed: / /

*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

REPORT OF RCRA COMPLIANCE INSPECTION

AT

PRIES ENTERPRISES, INCORPORATED
701 17th Street S.E.
Independence, Iowa 50644

EPA ID Number: IAD981716806

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA compliance evaluation inspection was performed at Pries Enterprises, Inc. in Independence, Iowa on February 11, 1988. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Pries Enterprises, Inc. (Pries):
Merle J. McMahon, President
Tom Kurinski, Plant Manager

U.S. Environmental Protection Agency (EPA):
David N. Whiting, Environmental Engineer

INSPECTION PROCEDURE

After arriving at Pries I contacted Mr. McMahon and presented him with my credentials. The purpose and procedure of the inspection were explained to Mr. McMahon and I discussed the confidentiality of business information with him. Mr. McMahon then acknowledged receipt of a RCRA Inspection Confidentiality Notice form by his signature (attachment 2). The inspection consisted of a discussion of operations, wastes generated, waste management practices, a review of pertinent documents and a tour of the plant. Most compliance information was obtained from Mr. McMahon and he also conducted the plant tour. Some compliance information was obtained from Mr. Kurinski. At the end of the inspection an exit interview was held with Mr. McMahon. At the end of the exit interview Mr. McMahon acknowledged receipt of the following by his signature: a Notice of Violation, a Request for Confidential Treatment of Information form and a Receipt for Documents (attachments 1, 3 & 4).

FACILITY AND PROCESS DESCRIPTION

The manufacturing activities at Pries result in extruded aluminum products. Seven inch diameter aluminum billets are heated to 900°F and then pressed through dies by hydraulic actuated force. The extruded aluminum products are trimmed and cut to length. In May of 1987 an addition to the plant was built to incorporate painting of extruded aluminum products. Mr. Kurinski said the painting process was operated on a trial basis in May, June and July of 1987. He further stated that the painting process was operated approximately 16 hours per week during August through December of 1987. The painting operation was preceded by aluminum parts cleaning operations in tanks. The painting operation was followed by paint drying in a large oven. The painting itself took place in two dry-filter paint spray booths. The colors applied were white, brown and black. The aluminum parts cleaning operation was comprised of the following tanks: a caustic (NaOH) and soap cleaner tank, two clear water rinse tanks, an electroless chrome deposition tank (chromating with chromic acid) and two clear water final rinse tanks. In conjunction with the aluminum parts cleaning process there was a wastewater treatment plant (WWTP) constructed and operated on-site. The WWTP consisted of an equalization tank for storage of wastewaters from the parts cleaning operation and treatment tanks for chrome reduction and solids sedimentation. Sludge removed after clarification was dewatered in a plate and frame filter press which resulted in a wastewater treatment plant sludge that is a listed hazardous waste, F019. Effluent from clarification was discharged to the publicly owned treatment works (POTW) under a pre-treatment agreement with the operators of the POTW (attachment 5). Mr. McMahon said effluent from the filter press was also discharged to the POTW.

Mr. McMahon said the painting operations and the parts cleaning operations were not functioning as designed, were not profitable and therefore were not used after 12/22/87. Mr. McMahon also stated that the operator in charge of the parts cleaning tanks in the WWTP was not fully competent and generated more wastewater to treat than should have been generated. Mr. McMahon has been on-site and serving as president of the company since the end of December 1987.

The plant was built in 1985 and covers of approximately about 55,000 ft². There is no perimeter fence around the plant property. Manufacturing operations began on 1/1/86. Mr. Kurinski said the plant operated two or three days a week from 1/1/86 to 8/1/86 and has since then been a 40 hour per week operation. Approximately 25 or 30 employees staff operations at Pries.

FINDINGS AND OBSERVATIONS

The operators of Pries originally notified for hazardous waste activities on 8/14/87. The information contained in the notification of hazardous waste activity was in error by stating there were listed hazardous wastes, K005 and U134, generated. The notification for hazardous waste activity was correct in identifying the generation of the listed hazardous waste, F019. Subsequent information submitted for Pries by James D. Usher (the former parts cleaning and WWTP operations manager) erroneously identified the following hazardous wastes generated at Pries: K004, K006, U134 and D002.

Wastes

262.34(c) The only hazardous waste generation at Pries occurred during the operation of the aluminum parts painting system. The hazardous wastes generated were: a spent thinner (xylene) a listed hazardous waste, F003 and the WWTP sludge, F019. The amount of spent thinner generated during the painting operations was less than one 55-gallon barrel (drum). The spent thinner was accumulated in the paint room near the painting area in a drum that was not labeled or marked to identify contents (see photo 1). The drum seemed to be approximately 4/5 full at the time of the inspection.

262.34(b) During operation of the painting system, 49 drums of F019 sludge were generated at Pries. The drums are stored inside the main plant building (see photos 2-4). All of the drums were labeled hazardous waste and many of the drums had tags affixed to them that indicated the beginning date of the period of accumulation. The oldest date seen on a tag was 8/27/87.

262.34(a) There were two drums in close proximity that had this same date. The drums were not all dated. The drums were stored side by side and there was no aisle space to permit visual observation of each and every drum. The hazardous waste labels were applied to the tops of the drums. The drums that were visible appeared to be structurally sound. All drums appeared to be closed. There are no weekly documented drum storage area inspections performed at Pries. There was also no operating record for WWTP operation or for drums of sludge generated located by Mr. McMahon. Mr. McMahon said the WWTP operator had kept a record but he could not find it at the time of the inspection.

265.174 There are also two drums of waste labeled "methyl parathion" (see photo 6). Mr. McMahon said he did not know where the waste came from and he was also not certain that the contents were identified correctly. One of the drums of the methyl parathion waste seemed to be full the other drum seemed to be approximately 1/4 full.

265.73 Waste oil generated from extruding operations at Pries have resulted in seven drums of waste oil since January of 1986. The waste oil was picked up by Eagle Oil Service of Cedar Falls, Iowa (attachment 6). The waste oil is spent hydraulic oil from the press operation.

Die cleaning operations at Pries are performed in a tank that contains a caustic (NaOH) solution. The used caustic solution is discharged to a storage tank outside the building at Pries (see photo 7). The storage tank holds about 300-gallons. Mr. Kurinski estimated the amount of used caustic generated from die cleaning to be about 300 gallons every six weeks. The used caustic is discharged from the tank in which it is used to the storage tank outside. There is permanent piping directly connected between the two tanks. The used caustic was used for pH adjustment in the WWTP on-site. The storage tank is also directly plumbed to the WWTP on-site for treatment use. The outside storage tank for used caustic appeared to be 1/2 full and contain 150-200 gallons of used caustic at the time of the inspection.

General trash is collected in drums in the plant. The trash is comprised of cardboard, paper, wood, sweeping compound and a small component of refuse. The trash in the drums is transported to the Buchanan County Sanitary Landfill (SLF), permit number 10-SDP-1-75P three times each week. Mr. McMahon estimated the total trash disposal at the SLF was approximately 3 yd³ per week.

Mr. Kurinski said that when the paint system was operating there were spent paint filters generated which were dried in the paint drying oven on-site and then transported with regular trash to the SLF. Mr. Kurinski estimated that 35 or 40 18-in² spent filters were generated when the painting process was operated.

Mr. McMahon said that application for disposal of the F019 sludge had been made to Chem Waste Management, CID Landfill in Calumet City, IL. He said that errors made by personnel at Pries had delayed the approval for waste disposal. The approval for waste disposal arrived at Pries the day of the inspection (attachment 7). The sludge has been tested for characteristics of hazardous waste (attachment 8). Mr. McMahon said that in addition to the 49 drums of F019 sludge in storage on-site, there was another 1,400 gallons of mixed wastewaters in the equalization tank (see photo 8) which would have to be treated, generating more sludge for disposal. He also stated that it may be necessary to drain the parts cleaning tanks and treat them on-site. Each of the tanks for parts cleaning hold approximately 2,800 gallons. All the tanks appeared to be full at the time of the inspection. I informed Mr. McMahon that there had been no hazardous waste determination made on the parts cleaning wastewater in the equalization tank prior to treatment and that this was a necessary determination.

262.11

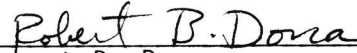
Part 265 Subparts B, C, D, G, & H

I also told Mr. McMahon that the storage of hazardous waste in drums over 90 days was not permitted to a generator of hazardous waste. The storage of hazardous waste over 90 days in drums at Pries requires the operators to comply with interim status regulations of which they were unaware and had made no effort to comply with. The operators of

Pries had not complied with the following interim status regulations: there was no general waste analysis plan; there was no general inspection schedule; there was no hazardous waste personnel training plan; there was no aisle space in the drum storage area; there were no arrangements made with local authorities concerning hazardous waste generation and storage; there was no hazardous waste contingency plan developed; there was no operating record maintained; there was no closure plan developed; there was no closure cost estimate; there was no financial assurance for closure cost and no liability coverage demonstration.



David N. Whiting
Environmental Engineer
Date: 3/4/88
Activity No.: AWF 39



Robert B. Dona
Chief, RCRA Monitoring Section
Date: 3/9/88

Attachments

1. Notice of Violation (2 pages)
2. RCRA Inspection Confidentiality Notice form (2 pages)
3. Request for Confidentiality Treatment of Information form
4. Receipt for Documents
5. Discharge agreement with POTW (3 pages)
6. Waste oil documents (2 pages)
7. IL EPA waste disposal approval (2 pages)
8. Sludge analysis (4 pages)
9. Photographs (3 pages)
10. Inspection checklist (9 pages)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

1/2

TO: Facility Name: Pries Enterprises Incorporated
Address: 701 17th St. S.E.
Independence Iowa 50644
EPA ID Number: IAD981716A06 Date: 2/11/88

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40 CFR 262.11</u>	<u>No hazardous waste determination on the parts cleaning wastewater prior to treatment</u>
<u>40 CFR 262.34(a)(2)</u>	<u>Waste water in the equalization tank.</u>
<u>40 CFR 262.34(b)</u>	<u>Date of accumulation not clearly marked on each container of hazardous waste.</u>
<u>40 CFR 262.34(c)(1)(ii)</u>	<u>Storage of hazardous waste over 90 days.</u>
<u>40 CFR Part 265 Subpart B</u>	<u>Satellite accumulation container of spent hydraulic not marked "hazardous waste" or other identification.</u>
<u>40 CFR Part 265 Subpart C</u>	<u>Interim status regulations for general facility standards.</u>
<u>40 CFR Part 265 Subpart D</u>	<u>Interim status regulations for packaging and presentation.</u>
<u>40 CFR 265.173</u>	<u>Interim status regulations for contingency procedures.</u>
<u>40 CFR Part 265 Subpart G</u>	<u>Emergency procedures.</u>
	<u>No up-to-date records.</u>
	<u>Interim status regulations for closure.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Pries Enterprises Inc. is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Michael Sanderson, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Pries Enterprises Inc. will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Jim Collier (U. S. EPA) at 913-236-2887, or Beth Keosterer (U. S. EPA), at 913-236-2887.

This Notice prepared by Don M. W. H. H. H. Date: 2/11/88

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: MERLE J. McMAHON Date: 2/11/88
Signature: M. J. McMahon
Title: Env.

**No of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)**

1/2

TO: Facility Name: Price Enterprises, Incorporated
 Address: 701 17th St. S.E.
 EPA ID Number: IA00001716800 Date: 2/11/99

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
<u>40 CFR 262.11</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(a)(2)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(b)</u>	<u>Date of implementation not clearly stated</u>
<u>40 CFR 262.34(c)(1)(i)</u>	<u>Storage of hazardous waste over 90 days</u>
<u>40 CFR 262.34(c)(1)(ii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(iii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(iv)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(v)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(vi)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(vii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(viii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(ix)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(x)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xi)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xiii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xiv)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xv)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xvi)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xvii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xviii)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xix)</u>	<u>Not having a written plan for the</u>
<u>40 CFR 262.34(c)(1)(xx)</u>	<u>Not having a written plan for the</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Price Enterprises, Inc. is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: John B. Boudreau, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Price Enterprises, Inc. will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call John B. Boudreau (U. S. EPA) at 413-236-7587, or Paul W. Hester, at 413-236-5997.

This Notice prepared by John B. Boudreau Date: 2/11/99

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: _____ Date: _____

Signature: _____

Title: _____

No. of Violation Pursuant to Requirements
of the source Conservation and Recovery Act (RCRA)

2/2

TO: Facility Name: Price Enterprises Incorporated
Address: 701 17th St SE
Atlanta, Georgia 30644
EPA ID Number: GA0691716 R06 Date: 2/11/89

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40 CFR 261.174</u>	<u>Failure to properly label hazardous waste</u>
<u>40 CFR 261.174</u>	<u>Failure to properly label hazardous waste</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Price Enterprises Incorporated is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Michael S. Smith, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Price Enterprises Incorporated will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Jim Callahan (U. S. EPA) at 913-236-2897, or 1-800-424-9393, at 913-236-2897.

This Notice prepared by Jim Callahan Date: 2/11/89

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Michael S. Smith Date: 2/11/89
Signature: _____
Title: _____

U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) David M. Whiting U.S. EPA, Region VII IA - RCRA Fed. Bldg. Rm 167 210 Wanlut Street Des Moines, IA 50309	Name and Address of Facility Pines Enterprises, Inc. 701 17th St. S.E. Independence IA 50644 Owner, Operator, or Agent in Charge Merle J. McMahon Title President Address same as above	
Name of Individual to Whom Notice Given Merle J. McMahon	Title President	Date 2/11/88

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility <i>Pries Aluminum Division</i>
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If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Air and Waste Management Division
United States Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name _____

Title _____

Signature *Mark J. McMahon* _____

Date _____

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name _____

Title _____

Address _____

ENVIRONMENTAL PROTECTION AGENCY
726 Minnesota Avenue
KANSAS CITY, Kansas 66101

REQUEST FOR CONFIDENTIAL
TREATMENT

Name of Individual	Title	Date
Merle M. Mahon	President	2/11/88
Firm Name	Firm Address	
Pries Enterprises, Inc.	701 17th Street S.E. Indep. Bldg. J.A. 50644	

Information for which Confidential Treatment is requested:

None requested at the time of the inspection.

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)	Title
<i>Merle M. Mahon</i>	<i>Pres.</i>
Name of Inspector	Inspector's Signature
<i>David R. Whiting, Environmental Engineer</i>	<i>David R. Whiting</i>

U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address <i>David N. Whiting</i> U.S. EPA, Region VII IA - RCRA Fed. Bldg. Rm 167 210 Walnut St Des Moines, IA 50309		Firm Name and Address <i>Pries Enterprises, Inc</i> <i>701 17th St. S.E.</i> <i>Id. 50614</i>
Date Collected <i>2/11/88</i>		Name of Individual <i>Merle M. Mahon</i>
Samples were: <input checked="" type="checkbox"/> Purchased		Title <i>President</i>
Sample Numbers		<input checked="" type="checkbox"/> Documents <input type="checkbox"/> Received no charge <input type="checkbox"/> Borrowed
Duplicate Samples Requested <input type="checkbox"/> Yes <input type="checkbox"/> No		Amount paid for Samples
Method of Payment <input type="checkbox"/> Cash <input type="checkbox"/> Voucher <input type="checkbox"/> To be Billed		

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged:

- 1) Chem waste management documents (2 pages)
- 2) Sewer lab analysis (2 pages)
- 3) IL EPA waste disposal approval (2 pages)
- 4) Eagle Owl service documents (2 pages)
- 5)

Signature (Owner, Operator, or Agent) <i>Merle M. Mahon</i>		Title <i>Pres.</i>
Name of Inspector <i>David N. Whiting</i>	Title <i>Environmental Engineer</i>	Inspector's Signature <i>David N. Whiting</i>

WATER QUALITY

OPERATION PERMIT APPLICATION

PROGRAM

TREATMENT AGREEMENT

WAMM USE

IOWA FACILITY NO.

IND. CONT. AGREEMENT NO.

REPLACES AGREEMENT NO.

NOTICE

A properly executed Treatment Agreement must be submitted by the contributor not less than one hundred eighty (180) days before the new major contributing industry proposes to discharge into a wastewater disposal system. Any proposed expansion, production increase or process modification that may result in any change to a previous Treatment Agreement requires execution of a new Treatment Agreement.

MAJOR INDUSTRIAL CONTRIBUTOR

SYSTEM RECEIVING WASTE

NAME

Pries Enterprises, Inc.

NAME

Independence Waste Water Treatment Plant

MAILING ADDRESS

701 17th Street S.E. Box 777

MAILING ADDRESS

1101 Three Elms Park Road

AUTHORIZED REPRESENTATIVE

James H. Gamerdinger

PHONE NO.

319-334-7068

AUTHORIZED REPRESENTATIVE

FRANK BRIMMER

PHONE NO.

319-2780

CERTIFICATION OF CONTRIBUTING INDUSTRY

I am the duly authorized representative for the major industrial contributor identified above and state that the proposed discharge to the system receiving waste identified above shall not exceed the quantities listed on page two of this form after

EFFECTIVE DATE

May 8, 1987

I further assure that notice of any anticipated increase in pollutants contributed shall be given to the owner of the system identified above sufficiently in advance of such increase to allow this contributor to submit a new treatment agreement to the Department of Water, Air and Waste Management not later than sixty days in advance of the increase or change.

TYPED OR PRINTED NAME

James H. Gamerdinger

TITLE

President

SIGNATURE

James H. Gamerdinger

DATE

May 8, 1987

CERTIFICATION OF SYSTEM RECEIVING WASTE

I am the duly authorized representative for the facility owner named above and state that the owner agrees to accept the discharge described on page two from the contributor identified above, and accepts responsibility for providing treatment of the volume and quantities described on the reverse in accordance with the provisions of Chapter 455B, Code of Iowa, and the rules of the Department of Water, Air and Waste Management. This agreement is conditioned on the industrial contributor complying with all applicable standards and requirements of the Department of Water, Air and Waste Management and the United States Environmental Protection Agency. This agreement is entered for the purpose of identifying pollutants contributed and limiting the quantity contributed, and shall not otherwise be construed to affect local ordinances, sewer service agreements or fee systems entered into between the parties.

This agreement may be modified or terminated by the owner of the disposal system if additional pollutants or additional quantities or volumes of pollutants are contributed other than identified on the reverse, or because of any condition that requires either a temporary or permanent reduction or elimination of the accepted contribution.

TYPED OR PRINTED NAME

Frank R. Brimmer

TITLE

Mayor, City of Independence

SIGNATURE

Frank R. Brimmer

DATE

7-14-87

1. PROCESS DESCRIPTION							
SPECIFIC MANUFACTURING PROCESS Aluminum Extrusion and Painting					SIC CODE 3354		
CONSUMPTION			PRODUCTION				
PRINCIPAL RAW MATERIAL(s)	AMOUNT CONSUMED PER DAY	PRINCIPAL PRODUCTS			AMOUNT PRODUCED PER DAY		
Aluminum	72,000lb	Formed Extrusions Painted Formed Extrusions			15,000lb 43,000lb		
2. HOURLY MAXIMUM FLOW CONTRIBUTION	3. DAYS OF OPERA- TION PER WEEK	4. HOURS OF OPERATION DURING PEAK DAY OF OPERATION	5. RANGE OF pH LEVEL		IN CONTRIBUTION MINIMUM MAXIMUM		
300	7	24	6.0		8.5		
6. DESCRIPTION OF PRETREATMENT PROVIDED Reduction of Cr VI to Cr III using sodium metabisulfite followed by Ph adjustment precipitation of Cr III and discharge of supernate to sanitary sewer - trace levels of CN will be reduced with zinc sulfate which will co-precipitate with Cr III. (Batch treatment operation)							
7. DESCRIPTION OF ANY BATCH OR PERIODIC DISCHARGES Only as above.							
8. COMPATIBLE WASTE IN CONTRIBUTION							
WASTEWATER PARAMETER	AVERAGE	MAXIMUM	DAILY RATE	WASTEWATER PARAMETER	AVERAGE	MAXIMUM	DAILY RATE
Flow (MGD)	.0004	.0008	.0006	Ammonia Nitrogen (lbs/day)	N/A	N/A	N/A
BOD ₅ (lbs/day)	N/A	N/A	N/A	Oil and Grease (mg/L)	0.11	0.11	0.11
Total Suspended Solids (lbs/day)	N/A	N/A	N/A				
Total Kjeldahl Nitro- gen (lbs/day)	N/A	N/A					
9. INCOMPATIBLE WASTE IN CONTRIBUTION (use blank 8 1/2 X 11 paper to continue this item)							
WASTEWATER PARAMETER	AVERAGE		MAXIMUM		HOURLY MAXIMUM		
	mg/l	lbs/day	mg/l	lbs/day	mg/l	lbs/day	
Total Chromium	0.219	0.016	0.666	0.040	0.666	0.040	
Cyanide	0.123	0.009	0.349	0.021	0.349	0.021	
Zinc	0.616	0.045	1.797	0.108	1.797	0.108	
Total Toxic Organics	1.214	0.073	1.214	0.073	1.214	0.073	

INSTRUCTIONS FOR COMPLETION OF PAGE 2

ITEM 1

A) Enter the Industry's Standard Industrial Classification Code Number (SIC code). The 1982 edition of the "Standard Industrial Classification Manual" or the current "Directory of Iowa Manufacturers" contains SIC code numbers and their descriptions.

B) Specify the principal product(s) or the principal raw material(s) and the maximum quantity produced or consumed in any day. Quantities are to be reported in units of measurement found in "Table III (Units of Measurement by SIC Code)". Other Industrial SIC categories not included in Table III should be listed in units of measurement normally used by the industry. Table III is available from the Department on request.

ITEM 2

Hourly Maximum is the maximum discharge during any single hour in the peak period of operation.

ITEM 6

Describe all pretreatment of waste prior to discharge to municipal collection system.

ITEM 7

Describe any occasional or intermittent discharges

and include the frequency of discharges and the amount. Such discharges could upset a treatment plant because of the shock effect of a sudden change in influent loading.

ITEM 8

Compatible Waste in Contribution means any waste parameter discharged that the receiving treatment works was designed to treat and does remove to a significant degree. Average is to represent the maximum 30-day average likely to occur in any year. Days when no discharge occurs should not be included in the average. Maximum is the maximum single-day contribution during a peak period of operation. Daily Rate is to be expressed as the average contribution during any shift(s) adjusted to 24-hour level in the peak period of operation. Operation time includes time allocated to cleanup if a wastewater discharge occurs. The peak period may be a month, season, etc. when maximum discharge occurs.

ITEM 9

Incompatible Waste in Contribution means any waste not qualifying within the definition of Item 8. List all such waste parameters that are contributed in concentrations greater than that present in the raw water supply.

*NOTE: A "Major Contributing Industry" means an Industrial user of a treatment works that:

- a. Has a flow of 50,000 gallons or more per average work day;
- b. Has a flow greater than five percent of the treatment works receiving the waste;
- c. Has in its waste a toxic pollutant in toxic amounts as defined in standards issued under Section 307a of the Clean Water Act and adopted by reference in 900--62.5 of the Iowa Administrative Code; or
- d. Is found by the Department of Water, Air and Waste Management to have a significant impact, either singly or in combination with other contributing industries, on that treatment works or on the quality of effluent from that treatment works.

EAGLE OIL SERVICE

P.O. Box 888

Cedar Falls, Ia. 50613

319-266-2369

Transporter & Reprocessor of Waste Oil
State Approved & EPA

EAGLE OIL SERVICE

NO 2121

P.O. Box 888

• CEDAR FALLS, IOWA 50613

Phone: (319) 266-2369

Hawkeye ALUMINUM DIV
701 17th St SE.
Independence Iowa
50644

DATE: 1-7-88

ORDER NO. _____

QUANTITY	DESCRIPTION	UNIT PRICE		AMOUNT	
550	waste oil	-0-		-0-	
TOTAL				-0-	



217/782-6762

FEBRUARY 03, 1988
APPLICATION RECEIVED: 01/26/88
PERMIT NUMBER 000069-0310390001
PERMIT ISSUED TO:

WASTE STREAM NUMBER 000000
PERMIT EXPIRES: 11/08/88

WASTE MANAGEMENT OF ILLINOIS
P.O. BOX 1226
CALUMET CITY, IL 60409

WASTE MANAGEMENT OF ILLINOIS
P.O. BOX 1226
CALUMET CITY, IL 60409

WASTE NAME: CHROMIC SULFATE
WASTE CLASS 49 HAZARDOUS SUBJECT TO FEE

USEPA HAZARDOUS WASTE NUMBERS:
F019

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

SITE NAME: CJD #1

IEPA SITE NO.: 0310390001

DISPOSITION OF WASTE: 2A
BULK OR CONTAINERIZED IN AREA SEPARATE FROM REFUSE

WASTE TREATMENT:

STORAGE:

ATTENTION: JAMES D. USHER
WASTE GENERATOR: HARVEY ALUMINUM
701 17TH ST
INDEPENDENCE

IEPA GENERATOR NO.: 0190195402

IA
50604

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

1. A. PURSUANT TO SECTION 39(H) OF THE ILLINOIS ENVIRONMENTAL PROTECTION ACT, AUTHORIZATION IS GRANTED FOR LAND DISPOSAL OF THIS WASTE. THIS AUTHORIZATION IS SUBJECT TO ANY CONDITIONS CONTAINED HEREIN.

B. AFTER RECEIPT AT THIS SITE, BUT PRIOR TO DISPOSAL, EVERY CONTAINER MUST BE SAMPLED AND ANALYZED BY THE PAINT FILTER TEST DESCRIBED IN 35 ILL. ADM. CODE, SECTION 729.320. NO WASTES THAT YIELD FLUID MAY BE DISPOSED.

C. PURSUANT TO 35 ILL. ADM. CODE, SECTION 709.041(B), AUTHORIZATION IS GRANTED FOR LANDFILL DISPOSAL OF THIS WASTE AS A RESIDUE FROM THE TREATMENT OF A LIQUID HAZARDOUS WASTE.



PAGE: 2

FEBRUARY 03, 1988
APPLICATION RECEIVED: 01/26/88
PERMIT NUMBER 880069-0310390001

WASTE STREAM NUMBER 080069
PERMIT EXPIRES: 11/08/88

LWL:MAS
CC:HARVEY ALUMINUM
REGION: MAYWOOD

Lawrence W. Easter
LAWRENCE W. EASTER, P.E.
MANAGER, PERMIT SECTION
DIVISION OF LAND POLLUTION CONTROL

RVD G27940
TSDR

A GENERAL INFORMATION

GENERATOR NAME: Pries Enterprises, Inc. TRANSPORTER: CWM
 FACILITY ADDRESS: 701 17th Street S.E. TRANSPORTER PHONE: (312) 896-7920
Independence, Iowa 50644 GENERATOR USEPA I.D. 08-117-1000
 TECHNICAL CONTACT: James D. Usher TITLE: Industrial Waste Treat. PHONE: (319) 334-7068
 NAME OF WASTE: Chromic Sulfate
 PROCESS GENERATING WASTE: Aluminum Conversion Coating

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR <u>Bluish White</u> to <u>Bluish Green</u>	ODOR <input checked="" type="checkbox"/> NONE <input type="checkbox"/> MILD <input type="checkbox"/> STRONG	PHYSICAL STATE @ 70°F <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> POWDER	LAYERS <input type="checkbox"/> MULTILAYERED <input type="checkbox"/> BI-LAYERED <input checked="" type="checkbox"/> SINGLE PHASED	FREE LIQUIDS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO VOLUME _____ %
	DESCRIBE _____			
pH: <input type="checkbox"/> < 2 <input type="checkbox"/> 7.1-10 <input type="checkbox"/> N/A <input type="checkbox"/> 2-4 <input type="checkbox"/> 10.1-12.5 <input checked="" type="checkbox"/> 4.1-6.9 <input type="checkbox"/> > 12.5 <input type="checkbox"/> 7 <input type="checkbox"/> EXACT _____	SPECIFIC GRAVITY <input type="checkbox"/> < .8 <input type="checkbox"/> 1.3-1.4 <input type="checkbox"/> .8-1.0 <input checked="" type="checkbox"/> 1.5-1.7 <input type="checkbox"/> 1.1-1.2 <input type="checkbox"/> > 1.7 <input type="checkbox"/> EXACT _____	FLASH POINT <input type="checkbox"/> < 70°F <input checked="" type="checkbox"/> > 200°F <input type="checkbox"/> CLOSED CUP <input type="checkbox"/> 70°F - 100°F <input type="checkbox"/> NO FLASH <input type="checkbox"/> OPEN CUP <input type="checkbox"/> 101°F - 130°F <input type="checkbox"/> EXACT _____ <input type="checkbox"/> 140°F - 200°F		

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

Sodium Hydroxide 11.975 %
Sodium Metabisulfate 3 %
Sulfuric Acid 8 %
Hydrofluoric Acid 20 %
Chromic Acid 18.025 %
Phosphoric Acid 40 %
 _____ %
 _____ %
 _____ %
 _____ %

D METALS ☐ TOTAL (PPM) ☒ EPA EXTRACTION PROCEDURE (mg/L)
 ARSENIC (As) < 0.005 SELENIUM (Se) < 0.01
 BARIUM (Ba) 0.2 SILVER (Ag) < 0.01
 CADMIUM (Cd) < 0.02 COPPER (Cu) .03
 CHROMIUM (Cr) 0.21 NICKEL (Ni) .1
 MERCURY (Hg) < 0.0005 ZINC (Zn) 0.27
 LEAD (Pb) < 0.2 THALLIUM (Tl) < 0.2
 CHROMIUM-HEX (Cr + 6) < 0.05

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES < 0.4 mg/kg PCB'S < 1 mg/kg
 SULFIDES < 10 mg/kg PHENOLICS 1.6 mg/kg

F SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO
 PROPER SHIPPING NAME Chromic Sulfate
 HAZARD CLASS ORM-E I.D. NO. 9100 R.Q. 1
 METHOD OF SHIPMENT: ☐ BULK LIQUID 9189 ☐ BULK SOLID
☒ DRUM (TYPE/SIZE) _____
 ANTICIPATED VOLUME: _____ GALS. _____ CUBIC YARDS
 _____ OTHER 15,000 lbs
 PER: ☒ ONE TIME ☐ WEEK ☐ MONTH
☐ QUARTER ☐ YEAR ☐ _____

G HAZARDOUS CHARACTERISTICS

REACTIVITY: ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER _____
 OTHER HAZARDOUS CHARACTERISTICS:
☒ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER _____
 USEPA HAZARDOUS WASTE? ☒ YES ☐ NO
 USEPA HAZARDOUS CODES U004 K006 H134
 STATE HAZARDOUS WASTE? ☒ YES ☐ NO
 STATE CODE(S) Same AS Above

H SPECIAL HANDLING INFORMATION

☐ ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.
 AUTHORIZED SIGNATURE

TITLE

DATE

James D. Usher 8-1 Unit Treat 11/10/82



CHEMICAL WASTE MANAGEMENT, INC., CID LANDFILL, 312-646-3099

TO: Merle McMahon
FROM: Debbie Menegoz 312-891-1500
DATE: 1-11-88
TIME: Noon
SENT TO FAX #: (319) 334 7060

Please forward 2 pages, including cover sheet, to the above named person.

THANK YOU.



SERCO Laboratories

St. Paul, Minnesota • Cedar Falls, Iowa

1922 Main Street — P.O. Box 625, Cedar Falls, Iowa 50613 (319) 277-2401

Waste Analysis

Client: Hawkeye Aluminum
Attn: Mr. Jim Usher
701 17th Street, SE
Independence, IA 50644

Date Sampled: - - -

Date Received: 10/21/87

Sample Identity: Sludge

Analysis

	<u>As Received</u>	
pH	8.4	S.U.
Total Solids	33.32	%
Cyanide (as CN)	<0.4	mg/kg
Phenol	1.6	mg/kg
Sulfide (as S)	<10	mg/kg
Polychlorinated Biphenyl	<1	mg/kg

<means less than

All analyses performed according to EPA publication SW-846, Third Edition.

November 6, 1987
nh 1605A
7-13585

Prepared and Submitted by
SERCO Laboratories

David W. Havick
Senior Chemist

RECEIVED NOV 7 1987





SERCO Laboratories

St. Paul, Minnesota • Cedar Falls, Iowa

.922 Main Street — P.O. Box 625, Cedar Falls, Iowa 50613 (319) 277-2401

EP Toxicity Test

Client: Hawkeye Aluminum
Attn: Mr. Jim Usher
701 17th St., SE
Independence, IA 50644

Date Sampled: - - -

Date Received: 10/21/87

Sample Identity: Sludge

Analysis

Concentration of Extract (mg/l)

Arsenic (as As)	<0.005
Barium (as Ba)	0.2
Cadmium (as Cd)	<0.02
Chromium (as Cr)	0.21
Hexavalent Chromium (as Cr)	<0.05
Copper (as Cu)	0.03
Lead (as Pb)	<0.2
Mercury (as Hg)	<0.0005
Nickel (as Ni)	0.1
Selenium (as Se)	<0.01
Silver (as Ag)	<0.01
Thallium (as Tl)	<0.2
Zinc (as Zn)	0.27
Final pH (of Extract)	8.4 S.U.

<means less than

EP Toxicity Test performed according to 40 CFR Part 261.24. All analyses performed in accordance with EPA publication SW-846, Third Edition.

November 6, 1987
nh 1605A
7-13585L

RECEIVED NOV 7 1987

Prepared and Submitted by
SERCO Laboratories

David W. Havick

David W. Havick
Senior Chemist

8-4



OCFR, Part 265

**RCRA COMPLIANCE INSPECTION REPORT
INTERIM STATUS FACILITY'S CHECKLIST**

Page 1/9

Section A - General Facility Standards

- §265.11 1. Does facility have an EPA Identification No.? ☒ Yes ☐ No
- a. If yes, EPA I.D. No. EA0981716E06
- b. If no, explain _____

- §265.12 2. Has facility received hazardous waste from a foreign source? ☐ Yes ☒ No

General Waste Analysis

- §265.13 3. Has facility obtained detailed chemical and physical data of waste prior to treatment, storage or disposal? *McMahon not sure of what is in drums labeled as "methyl parathion"* ☐ Yes ☒ No
- a. Was data determined from: *FOIA waste has been correctly determined*
- (1) Knowledge of processes/wastes? ☐ Yes ☒ No
- (2) Actual analysis of representative sample? ☐ Yes ☒ No
- b. Are analysis repeated as necessary to ensure data is accurate and up-to-date? ☐ Yes ☒ No
- c. (For off-site facility) Does owner/operator inspect and, if necessary, analyze each waste movement received? ☐ Yes ☒ No
4. Does facility have a written waste analysis plan? ☐ Yes ☒ No
- a. Is the plan kept at the facility? ☐ Yes ☒ No
- b. Does the plan include:
- (1) Parameters for which each waste will be analyzed? ☐ Yes ☒ No
- (2) Test methods used to test for these parameters? ☐ Yes ☒ No
- (3) Sampling method used to obtain sample? ☐ Yes ☒ No
- (4) Frequency with which initial analyses will be reviewed or repeated? ☐ Yes ☒ No
- (5) (For off-site facility) Waste analysis that generators have agreed to supply? ☐ Yes ☒ No

(6) (For off-site facility) Procedures which are used to inspect and, if necessary, analyze each movement of hazardous waste received including: ☐ Yes ☐ No

(a) Procedures used to determine the identity of each movement of waste? ☐ Yes ☐ No

(b) Sampling method to obtain representative sample of waste to be identified ☐ Yes ☐ No

Security

§265.14

5. Does the facility provide adequate security through:

a. 24-hour surveillance system? (e.g. television monitoring or guards) ☐ Yes ☐ No

OR

b. Artificial or natural barrier around facility (e.g. fence or fence and cliff)? ☐ Yes ☐ No

Describe no perimeter fence. Bldg. locked after hours; storage of drums inside bldg.

And means to control entry through entrances (e.g. attendant, television monitors, locked entrance, controlled roadway access)? ☐ Yes ☐ No

Describe _____

c. Are signs with the legend, "Danger - Unauthorized Personnel Keep Out" posted? ☐ Yes ☒ No

General Inspection Requirements

§265.15

6. Does the owner/operator maintain a written schedule at the facility? ☐ Yes ☒ No

a. Does the schedule include the inspection of:

(1) Monitoring equipment? ☐ Yes ☐ No

(2) Safety and emergency equipment? ☐ Yes ☐ No

(3) Security devices? ☐ Yes ☐ No

(4) Operating and structural equipment? ☐ Yes ☐ No

b. Does the schedule identify the types of problems to be looked for? ☐ Yes ☐ No

7. Does the owner/operator maintain an inspection log?

___ Yes ☒ No

a. Does it include:

(1) Date and time of inspection?

___ Yes ___ No

(2) Name of inspector?

___ Yes ___ No

(3) Notation of observation?

___ Yes ___ No

(4) Date and nature of repairs or remedial action?

___ Yes ___ No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet).

Personnel Training

§265.16

8. Does facility have a training program?

___ Yes ☒ No

a. Are the following records maintained?

(1) Job title and name of individual filling each job?

___ Yes ☒ No

(2) Written description of each job?

___ Yes ☒ No

(3) Written description of type and amount of training to be given?

___ Yes ☒ No

(4) Documentation of training given?

___ Yes ☒ No

b. Is an annual review of training accomplished?

___ Yes ___ No

c. Are the training records maintained at the facility?

___ Yes ☒ No

d. How long are records kept for:

1) Current employees? _____

2) Former employees? _____

Requirements for Ignitable, Reactive or Incompatible Wastes

§265.17

9. Does facility handle ignitable or reactive wastes? ☒ Yes ___ No

a. If yes, is waste separated and protected from sources of ignition or reaction: open flames, smoking, cutting and welding, hot surfaces, frictional heat,

less than 1 drum apart

sparks (static, electrical or mechanical), spontaneous ignition; e.g. from heat-producing chemical reactions, and radiant heat?

☒ Yes ☐ No

1) If yes, use narrative explanations sheet to describe separation and protection measures.

in paint room (store room)

2) If no, use narrative explanations sheet to describe sources of ignition or reaction?

☐ Yes ☐ No

b. Are smoking and open flame confined to specifically designed locations?

☐ Yes ☐ No

c. Are "No Smoking" signs posted in hazardous areas?

posted in store room
☒ Yes ☐ No

Section B - Preparedness and Prevention

§265.31

1. Is there evidence of fire, explosion or contamination of the environment?

☐ Yes ☒ No

If yes, use narrative explanation sheet to explain.

§265.32

2. Is the facility equipped with (as appropriate)

a. Internal communication or alarm system?

☒ Yes ☐ No

b. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No

c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?

☒ Yes ☐ No

d. Water of adequate volume and pressure for hoses, sprinklers or water spray systems?

☐ Yes ☐ No

Describe source of water _____

§265.33

3. Are all communications or alarm systems, fire protection equipment, spill control equipment and decontamination equipment where required, tested and maintained to assure proper operation?

☐ Yes ☐ No

§265.34

4. Are communications or alarm systems, where required, readily accessible?

☒ Yes ☐ No

§265.35

5. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?

☐ Yes ☒ No

no aisle space in drum storage area

§265.37

6. Has the owner/operator attempted to make the following arrangements with the local authorities as appropriate:

a. To familiarize police, fire departments and emergency response teams with layout of facility, properties of hazardous waste handled and associated hazards, places where personnel would normally be working, entrances to roads inside facility and possible evacuation routes? ☐ Yes ☒ No

b. In the case where more than one police and fire department might respond, agreements designating primary emergency authority? ☐ Yes ☐ No

c. Agreements with State emergency response teams, emergency response contractors and equipment suppliers? ☐ Yes ☐ No

d. To familiarize local hospitals with the properties of hazardous wastes handled and types of injuries or illnesses that would result? ☐ Yes ☐ No

7. Where state or local authorities decline to enter into such arrangements, is this documented in the operating record? ☐ Yes ☐ No

Section C. Contingency Plan and Emergency Procedures

§265.52

1. Does the facility have a contingency plan? ☐ Yes ☒ No

a. Is it an amendment to a Spill Prevention Control and Countermeasures (SPCC) Plan? ☐ Yes ☐ No

b. Does the plan include:

(1) Arrangements with local authorities to coordinate emergency services? ☐ Yes ☐ No

(2) List of names, addresses and phone numbers of emergency coordinators? ☐ Yes ☐ No

(3) List of all emergency equipment at facility? ☐ Yes ☐ No

(4) Evacuation plan ☐ Yes ☐ No

c. Is a copy of the contingency plan and all revisions:

(1) Maintained at the facility? ☐ Yes ☐ No

(2) Submitted to all local authorities that may be called upon to provide services? ☐ Yes ☐ No

- §265.55 2. Is there an emergency coordinator on site or on call at all times? ☐ Yes ☐ No
3. Have there been any incidents requiring the implementation of the contingency plan? ☐ Yes ☐ No
-

Section D. Manifest System, Recordkeeping and Reporting

- §265.71 1. Does facility receive hazardous wastes from off-site sources? (If no, proceed to question 2) ☐ Yes ☒ No
- a. Are hazardous waste shipments accompanied by a manifest? ☐ Yes ☐ No
- 1) If yes, does owner/operator:
- a. Sign and date each copy of manifest? ☐ Yes ☐ No
- b. Note any significant discrepancies on each copy of manifest? ☐ Yes ☐ No
- c. Give transportor signed copy of manifest? ☐ Yes ☐ No
- d. Send copy of signed copy of manifest to generator within 30 days? ☐ Yes ☐ No
- e. Retain copy of each manifest? ☐ Yes ☐ No
- 2) Does facility receive any wastes from a rail or water (bulk shipment) transporter? ☐ Yes ☐ No
- a. If yes, is it accompanied by a shipping paper? ☐ Yes ☐ No
- b. If accompanied by a shipping paper, does the owner/operator utilize it as a manifest? ☐ Yes ☐ No
- §265.76 3) If no, does owner/operator submit an unmanifested waste report? ☐ Yes ☐ No
- §265.72 b. If facility has received any shipments of wastes that were inconsistent with the manifest, did owner/operator:
- 1) Attempt to reconcile the discrepancy with the generator or transporter? ☐ Yes ☐ No
- 2) Submit letter to Regional Administrator on unresolved discrepancies? ☐ Yes ☐ No

§265.71 2. Does owner/operator initiate shipments of hazardous wastes from facility? *have not to date* Yes ☒ No

If yes, does owner/operator meet Part 262 requirements? (Complete Generator's Checklist) Yes ☐ No

§265.73 3. Does owner/operator maintain a written operating record at the facility? Yes ☒ No

If yes, does it include:

a. Description and quantity of each hazardous wastes received? Yes ☐ No

b. Method and date of treatment, storage or disposal? Yes ☐ No

c. Location and quantity of each hazardous wastes within facility? Yes ☐ No

d. Records and results of waste analysis? Yes ☐ No

e. Reports of incidents requiring implementation of contingency plan? Yes ☐ No

f. Records and results of inspections? Yes ☐ No

g. Monitoring, testing or analytical data where required? Yes ☐ No

h. Closure cost estimates and (for disposal facilities) post-closure cost estimates? Yes ☐ No

§265.75 4. Does owner/operator submit biennial reports to the Regional Administrator? Yes ☐ No

Section E. Closure and Post-Closure

§265.13 1. Does the facility have a written closure plan? Yes ☒ No

a. Is a copy of the plan and all revisions to the plan kept at the facility? Yes ☐ No

b. Does the plan include?

(1) A description of how and when the facility will be partially closed, if applicable, and finally closed? Yes ☐ No

(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time? Yes ☐ No

(3) A description of how equipment will be decontaminated? ☐ Yes ☐ No

(4) An estimate of the expected year of closure and a schedule for final closure? ☐ Yes ☐ No

(5) How the applicable requirements of §265.197 (tanks), §265.228 (surface impoundments), §265.258 (waste piles), §265.280 (land treatment), §265.310 (landfills), §265.351 (incinerators), §265.381 (thermal treatment), and §265.404 (chemical, physical and biological treatment) are to be met? ☐ Yes ☐ No

c. If closure is occurring or has occurred, was the closure plan submitted to the Regional Administrator 180 days prior to the date closure was/is to begin? ☐ Yes ☐ No

§265.113 (1) Was closure/is closure being completed within the time allowed? ☐ Yes ☐ No

(2) Was closure/is closure being completed in accordance with the approved closure plan? ☐ Yes ☐ No

§265.115 (3) Was a certification submitted to the Regional Administrator upon completion of closure? ☐ Yes ☐ No

§265.117 2. (Disposal facilities only) Is the facility required to have post-closure care? ☐ Yes ☐ No

a. If required, does the facility have a copy of the written post-closure plan with all revisions at the facility? ☐ Yes ☐ No

§265.118 b. If required, does the plan identify the activities and frequency of these activities which will be carried on after closure? ☐ Yes ☐ No

Section F. Financial Requirements

§265.142 1. Does the facility have the latest closure cost estimate or adjusted closure cost estimate on hand? ☐ Yes ☒ No

a. Does the owner/operator adjust the closure cost estimate annually or revise the closure cost estimate when the closure plan is charged? ☐ Yes ☐ No

§265.143 b. Has the owner/operator established financial assurance for closure? ☐ Yes ☒ No

§265.144 2. (For disposal facilities only). Does the facility have the latest post-closure cost estimate or adjusted closure cost estimate on hand? ☐ Yes ☐ No

a. Does the owner/operator adjust the post-closure cost estimate annually or revise it when the post-closure plan is changed?

___ Yes ___ No

§265.145

b. Has the owner/operator established financial assurance for post-closure?

___ Yes ___ No

§265.146

3. Has the owner/operator demonstrated financial responsibility for sudden accidental occurrences either by having liability insurance or by passing the financial test for liability coverage, or combination of the two?

___ Yes ☒ No

§265.147

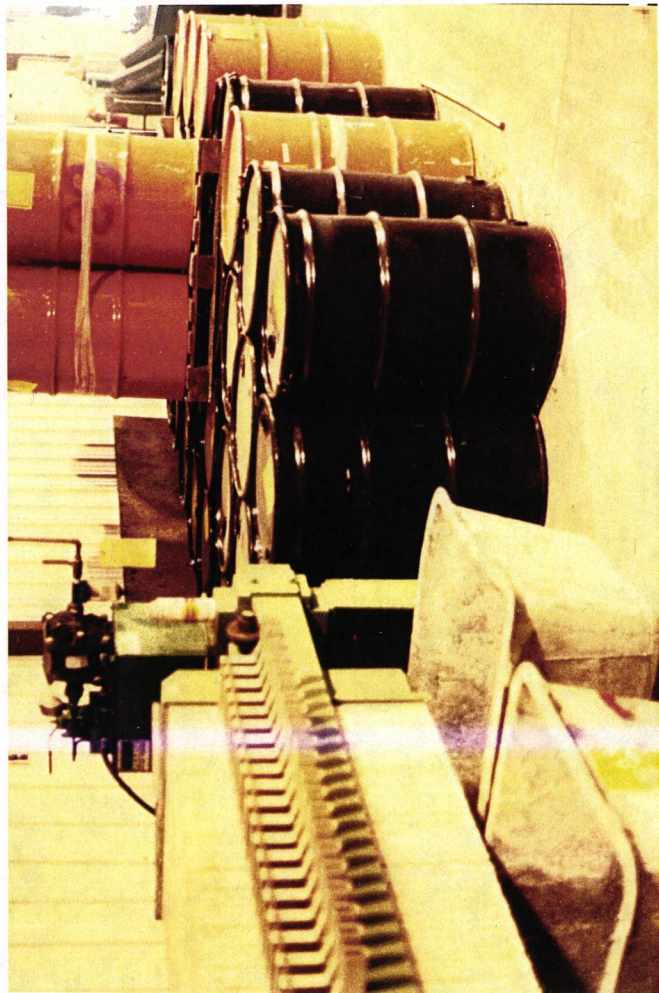
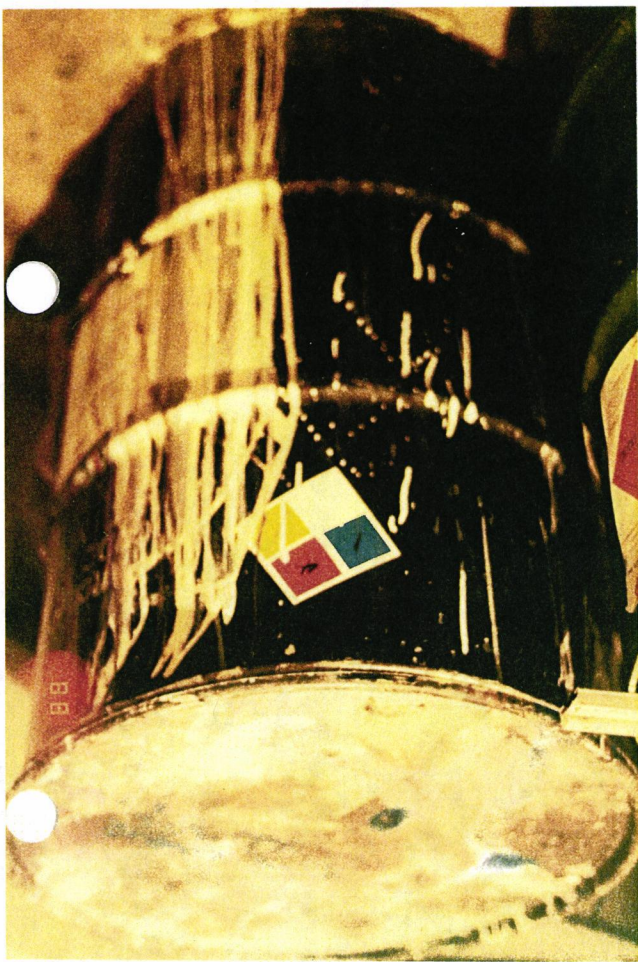
4. (For surface impoundments, landfills, or land treatment only). Has the owner/operator demonstrated financial responsibility for nonsudden occurrences either by having liability insurance or by passing the financial test for liability, or combination of the two?

___ Yes ___ No

RCRA COMPLIANCE INSPECTION REPORT
CONTAINERS CHECKLIST

Subpart I
40 CFR Part 265

- §265.171 1. Are all containers in good condition; i.e., not showing signs of leakage, corrosion or any other deterioration/deformation? ☒ Yes ☐ No
- §265.172 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that containers will not react with the hazardous wastes? ☒ Yes ☐ No
- §265.173 3. Are all containers holding hazardous wastes kept closed during storage? ☒ Yes ☐ No
- §265.174 4. Are areas where hazardous wastes containers are stored inspected at least once a week? ☐ Yes ☒ No
5. Is an inspection log maintained? ☐ Yes ☒ No
- §265.176 6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? ☒ Yes ☐ No
- §265.177 7. Are incompatible wastes or incompatible wastes and materials, placed in the same container? ☐ Yes ☒ No
8. Are storage containers holding hazardous wastes which are incompatible with nearby materials separated or protected by means of a dike, berm, well or other device. ☒ Yes ☐ No



HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND CONTACT THE NEAREST POLICE
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER (DOT)
SHIPPING NAME _____ UN OR NA# _____

GENERAL INFORMATION
NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____

EPA
ID NO. 480982716806 EPA
WASTE NO. _____

ACCUMULATION
START DATE _____ MANIFEST
DOCUMENT NO. _____

CAUTION:
THIS CONTAINER HOLDS HAZARDOUS OR TOXIC WASTE.
HANDLE WITH CARE!
© Copyright Science Related Materials Inc., Janesville, WI 53547

2/11/88

Pries Enterprises
("Pries Ent.")
Drum of partially full
spent paint thinner

DNU

2/11/88

Pries Ent.
Filter press and drums of
FO19 sludge.

DNU

2

DNU

Pries Ent.
Drums of FO19 sludge.

3

88

DNU

Pries Ent.
Drums of FO19 sludge

88

5

DNU

Pries Ent.
Label on a drum of FO19
sludge

1/88

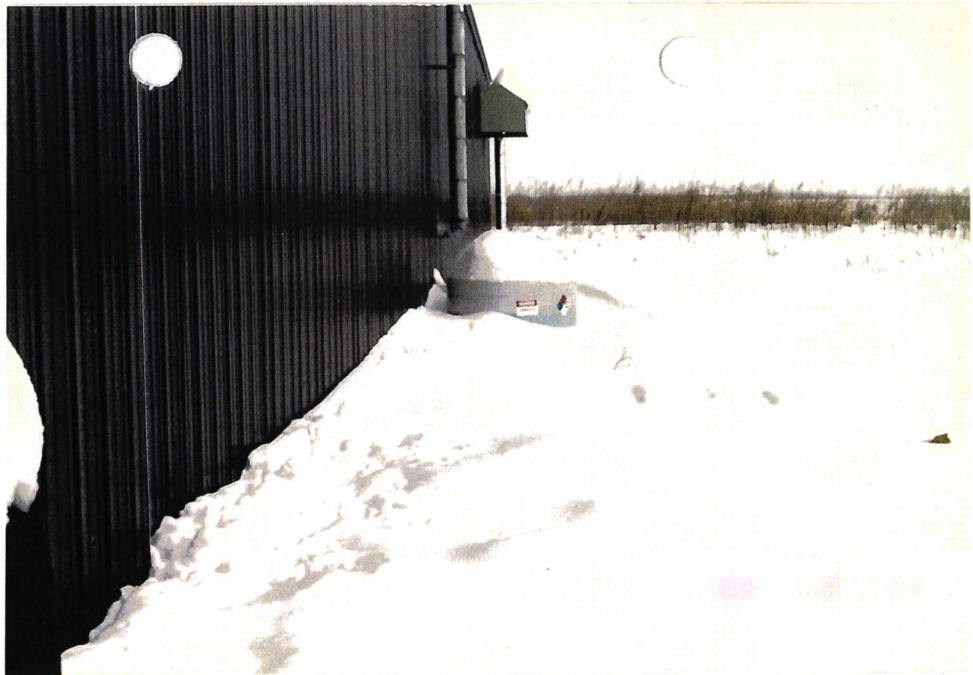
HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND CONTACT THE NEAREST POLICE
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY.

PROPER DOT Methyl
SHIPPING NAME Diethyltoluene UN OR NA# 2783

GENERAL INFORMATION:
NAME KATES ENTERPRISES INC
ADDRESS 701 17th ST SE
CITY Independence STATE La ZIP 50644

EPA ID NO. PA0981716806 EPA WASTE NO. _____
ACCUMULATION START DATE 2/24/87 MANIFEST DOCUMENT NO. 1000

CAUTION:
THIS CONTAINER HOLDS HAZARDOUS OR TOXIC WASTE.
HANDLE WITH CARE!
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1/88

6

Pries Ent.

Label on a drum of "methyl
parathion".

DNW

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7

Pries Ent.

Tank for used caustic (NaOH)
solution outside bldg. from
WWTP.

DNW

1/88

8

Pries Ent.

Equalization tank for aluminum
parts cleaning wastewater.